

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

SIMON NICHOLAS RICHMOND,

Plaintiff,

V.

WINCHANCE SOLAR FUJIAN  
TECHNOLOGY CO. LTD., ET. AL.

Defendants.

Case No.: 3:13-cv-01954-MLC-DEA

*Document Filed Electronically*

Return Date: April 21, 2014

**DEFENDANT WINCHANCE SOLAR FUJIAN TECHNOLOGY  
CO. LTD.'S NOTICE OF MOTION FOR LEAVE OF COURT TO PERMIT  
ANDREW GRODIN AND MARC FRIEDMAN TO WITHDRAW AS COUNSEL**

**PLEASE TAKE NOTICE** that on April 21, 2014, Defendant's counsel, identified in the signature blocks below, shall make application to the United States District Court for the District of New Jersey for an order granting Defendant Winchance Solar Fujian Technology Co. Ltd.'s ("Winchance") Motion for Leave of Court in accordance with L.R. §102.1 to permit Andrew M. Grodin and Marc S. Friedman to withdraw as Counsel ("Motion").

**PLEASE TAKE FURTHER NOTICE** that in support of its Motion, Defendant shall rely upon the information set forth in its Statement under LR. §7.1(d)(4) and in the Declaration of Andrew Grodin filed concurrently herewith. Defendant further states that a proposed order granting said Motion is annexed thereto, in accordance with Local Civil Rule 7.1(e).

March 21, 2014

Respectfully,

By: s/ Andrew M. Grodin

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